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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
11 Liability Litigation

No. MD-15-02641-PHX-DGC

12 **PLAINTIFFS' NOTICE OF LODGING**
13 **CERTAIN DOCUMENTS UNDER SEAL**
14 **REGARDING PLAINTIFF'S RESPONSE**
15 **IN OPPOSITION TO DEFENDANTS'**
MOTION *IN LIMINE* NO. 3

16 Pursuant to LRCiv 5.6(d), Plaintiffs submits this Notice of Lodging Certain
17 Documents Under Seal regarding Plaintiffs' Response in Opposition to Defendants'
18 Motion *in Limine* No. 3 to Exclude Evidence of the Crisis Communication Plan.

19 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the
20 Court the documents listed on Exhibit A to this Notice.

21 Defendants contend that the documents listed in Exhibit A are confidential and
22 should be filed under seal. As required under LRCiv 5.6(d), Plaintiffs certify that on April
23 12, 2019, the parties met and conferred in good faith and were unable to agree about
24 whether the documents are confidential under the Protective Order and should be filed
25 under seal. Plaintiffs do not believe that the disputed documents warrant continued
26 confidential treatment as proprietary or sensitive trade secret information.

27 This dispute notwithstanding, the parties have agreed to continue to meet and
28 confer on the documents at issue.

1 RESPECTFULLY SUBMITTED this 12th day of April 2019.

2 BEUS GILBERT, PLLC

3 By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of April, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine

EXHIBIT A

Ex. B to Plaintiff's Response in Opposition to Defendants' Motion *in Limine* No. 3 to Exclude Evidence of the Crisis Communication Plan

Ex. C to Plaintiff's Response in Opposition to Defendants' Motion *in Limine* No. 3 to Exclude Evidence of the Crisis Communication Plan

Ex. D to Plaintiff's Response in Opposition to Defendants' Motion *in Limine* No. 3 to Exclude Evidence of the Crisis Communication Plan